

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

TRENT JORDAN,

Plaintiff,

v.

JOHN DOE 1, aka BORAKK,

Defendant.

Civil Action No. 05-cv-11452 (DPW)

**MEMORANDUM OF LAW IN SUPPORT OF  
PLAINTIFF'S EX PARTE MOTION FOR ORDER TO SHOW CAUSE AND  
PLAINTIFF'S MOTION FOR EXPEDITED, PRE-SERVICE DISCOVERY**

Trent Jordan, Plaintiff in the above captioned action, by his attorneys, respectfully submits this memorandum of law in support of his ex parte motion for an Order to Show Cause, and his motion, pursuant to Federal Rules 26(d) and 45, seeking this Court's leave to serve expedited, pre-service discovery on Lycos, Inc. ("Lycos"), a third-party Internet service provider ("ISP"), and upon the presently unknown ISP that is providing Internet access to Defendant John Doe 1, aka Borakk, an anonymous party who is being sued for libel in the above captioned action.

**PRELIMINARY STATEMENT**

This is an action for libel, wherein Mr. Jordan is seeking relief from numerous anonymous, defamatory statements published on the Internet by a person using the assumed identity "Borakk." Since early June 2005, Borakk has been anonymously posting false and defamatory statements about Mr. Jordan on various bulletin boards provided and operated by Lycos. Mr. Jordan seeks this Court's leave to serve expedited, pre-service discovery on Lycos,

and if necessary upon the ISP providing Internet access to the defendant for the limited purpose of determining the true identity of Borakk so that he may be served.

First, Mr. Jordan requests permission to serve a Rule 45 subpoena on Lycos, operator of the Raging Bull bulletin board service, to obtain any identifying information Borakk submitted when registering for the Raging Bull service, and for records disclosing the unique Internet protocol ("IP") address associated with Borakk's postings.<sup>1</sup> The proposed subpoena seeking this information from Lycos would contain a document request in the form annexed hereto as Exhibit B. Upon obtaining Borakk's IP address, Mr. Jordan may be able to determine which ISP is providing Internet access to Borakk. Fakler Decl. ¶ 12. Mr. Jordan also requests permission to serve another Rule 45 subpoena on this ISP to obtain the name and address of the defendant, or at least the location of the computer used by the defendant, as that information is contained in the ISP's log files. Fakler Decl. ¶ 12. Although this subpoena seeking this information may have to be modified somewhat depending on the information obtained in response to the first subpoena, a draft of the document request that would be annexed to this proposed subpoena is annexed hereto as Exhibit C. ISPs typically keep log files of subscribers' activities for limited periods of time, sometimes for as little as one month, before erasing the data. Fakler Decl. ¶¶ 13-15. Time is therefore of the essence, as this information may become unavailable shortly. Consequently, Mr. Jordan requests that the subpoenas provide for production of responsive information within seven business days.

Mr. Jordan respectfully requests that this Court grant him leave to serve limited, expedited discovery on Lycos, and the ISP providing access to Borakk, to determine the true identity of Borakk. Due to Borakk's purposeful anonymity, there is no other way for Mr. Jordan

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<sup>1</sup> Declaration of Paul M. Fakler, dated July 21, 2005 ("Fakler Decl."), ¶ 11. Mr. Fakler's Declaration is attached as Exhibit A hereto.

to determine Borakk's identity and location. Without this critical information, Mr. Jordan will never be able to obtain relief.

### **FACTS**

The Plaintiff, Mr. Jordan, is an individual investor and venture capitalist who frequently invests in early-stage businesses, providing them the capital to mature into successful, publicly traded companies. Verified Complaint ¶ 7.<sup>2</sup> The Defendant is an individual who established an account with Lycos under the assumed screen-name "Borakk." Verified Complaint ¶ 8. Borakk's true name, identity and contact information is presently unknown to Mr. Jordan because Borakk chose not to list any of that information in the biographical profile associated with his screen name. *Id.* Mr. Jordan has therefore been forced to sue Borakk by his anonymous screen name until his true identity is revealed.

Beginning in early June 2005, Borakk began posting false and defamatory comments about Mr. Jordan on various bulletin boards maintained by Lycos as part of its Raging Bull service, which allows registered users to post comments relating to investments in publicly traded companies. Verified Complaint ¶ 10. For example, on June 4, 2005, Borakk posted a message on the GOCM bulletin board (for a company name Geocom Resources), stating that Mr. Jordan was responsible for destroying the value of a certain company through fraudulent stock manipulation and referring to Mr. Jordan as "Nice guy, the criminal left GOCM in the same condition." Verified Complaint ¶ 11 & Ex. A. This statement is false, as Mr. Jordan has never been responsible for any harm to that company's stock through fraudulent stock manipulation or otherwise. Verified Complaint ¶ 12.

On June 6, 2005, Borakk posted a message on the CYXP board (for a company named

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<sup>2</sup> A copy of the Verified Complaint filed in this case is attached hereto as Exhibit D.

Cityxpress) containing another false statement about Mr. Jordan:

Trent Jordan and his gang put these scams together owning all of the free trading stock. They pay \$1M to \$2M for massive promotional campaign (pump BLLD to \$6) and dump all their paper. The idiots buying into the pump have no idea who is selling their stock. Jordan walks away with millions in trading profits leaving a broken company to struggle on its own. BLLD is one of many Jordan pumps and dumps. WKWG/CYXP, GOCM, IDCO were others and his current scam is LLLI.

Verified Complaint ¶¶ 13, 14 & Ex. B. The phrase “pump and dump” is a term used in the investing community to mean an illegal scheme for making money by fraudulently manipulating stock prices; the schemer persuades other people to buy the stock and then sells it himself as soon as the price of the stock rises. Verified Complaint ¶ 13.

Later on June 6, 2005, Borakk again posted a false statement on the CYXP board stating that “honest guys trying to build real companies get conned by criminals like Trent Jordan . . .” Verified Complaint ¶¶ 15, 16 & Ex. C. On June 10, 2005, Borakk posted a message on the Interac Data (“IDCO”) board falsely stating that “Trend [sic] Jordan pumped and dumped heavy in February, IDCO never recovered after that. In case you dummies don’t know, Trent Jordan put this whole scam together so he could dump free trading stock!” Verified Complaint ¶¶ 17, 18 & Ex. D.

On June 17, 2005, Borakk posted a message on the Lamperd Less Lethal, Inc. (“LLLI”) board falsely stating that “Trent Jordan’s boiler room got snuffed out, they are under the crushing weight of the law.” Verified Complaint ¶¶ 19, 20 & Ex. E. This statement, as well as the statements described above are but a few of many messages posted by Borakk since early June 2005, and continuing up through the filing of this action, which falsely state that Mr. Jordan has been involved in various fraudulent stock manipulation schemes and describe him as a liar and criminal who has been driven out of business by legal authorities. Verified Complaint ¶¶ 11-28

& Exs. A-H. These defamatory statements are all untrue. Mr. Jordan has never been convicted of a crime and has never engaged in illegal stock manipulation practices. Verified Complaint ¶¶ 14, 16, 18.

### **ARGUMENT**

Massachusetts courts have yet to expressly address the appropriate procedures and standards to be applied in evaluating applications for discovery of the identity of anonymous users of ISP message boards in defamation cases. However, this issue was expressly addressed in *Dendrite Int'l, Inc. v. John Doe No. 3*, 342 N.J. Super. 134, 775 A.2d 756 (N.J. App. Div. 2001). In *Dendrite*, the plaintiff sought leave to conduct limited expedited discovery for the purpose of ascertaining the identity of the defendant, John Doe No. 3, from Yahoo, an ISP. *Id.* at 140. The posting of certain comments about Dendrite on a Yahoo! bulletin board by the anonymous defendant formed the basis of a claim for defamation. *Id.* The trial court denied the plaintiff's request. *Id.*

On appeal, the Appellate Division held that a four prong test should be applied to determine whether to grant a plaintiff's application for expedited discovery where the plaintiff seeks to compel an ISP to disclose the identity of an anonymous Internet poster who is being sued for violating the rights of individuals, corporations or businesses. *Id.* at 141.

First, the court held that the trial court should require the plaintiff "to undertake efforts to notify the anonymous posters that they are the subject of a subpoena or application for an order of disclosure, and withhold action to afford the fictitiously-named defendants a reasonable opportunity to file and serve opposition to the application." *Id.*

Second, the court "shall require the plaintiff to identify and set forth the exact statements purportedly made by each anonymous poster that plaintiff alleges constitutes actionable speech." *Id.*



Third, the plaintiff must “set forth a prima facie cause of action against the fictitiously-name anonymous defendant.” The plaintiff must establish that it can withstand a motion to dismiss for failure to state a claim and “must produce sufficient evidence supporting each element of its cause of action, on a prima facie basis, prior to a court ordering disclosure of the identity of the unnamed defendant.” *Id.*

Finally, assuming the court concludes that the plaintiff has presented a prima facie cause of action, “the court must balance the defendant’s First Amendment right of anonymous free speech against the strength of the prima facie case presented and the necessity for the disclosure of the anonymous defendant’s identity to allow the plaintiff to properly proceed.” *Id.* at 142. “The application of these procedures and standards must be undertaken and analyzed on a case-by-case basis.” *Id.*

The court noted that this test should “act as a flexible, non-technical, fact-sensitive mechanism for courts to use as a means of ensuring that plaintiffs do not use discovery procedures to ascertain the identities of unknown defendants in order to harass, intimidate or silence critics in the public forum opportunities presented by the Internet.” *Id.* at 156. As such, this test is meant to protect anonymous free speech.

Other jurisdictions have applied some or all of the above requirements in similar contexts. *See, e.g., Elektra Entertainment Group, Inc. v. Does 1-9*, No. 04 Civ. 2289, 2004 WL 2095581 at \*4 (S.D.N.Y. Sept. 8, 2004) (applying variation of *Dendrite* test and denying anonymous defendant’s motion to quash subpoena seeking identity of defendants who were allegedly disseminating plaintiff’s copyrighted sound recordings on the Internet); *see also Sony Music Entertainment Inc. v. Does 1-40*, 326 F. Supp. 2d 556, 564-65 (S.D.N.Y. July 27, 2004) (same); *In re Subpoena Duces Tecum to America Online, Inc.*, 52 Va. 26, 2000 WL 1210372 at

\*8 (Va. Cir. Ct. 2000) (ordering AOL to disclose identities of John Doe defendants who posted allegedly defamatory comments on a stock-trading Internet chat room maintained by AOL).

We respectfully request that this Court adopt the requirements for disclosure set forth in *Dendrite* to decide this motion. Mr. Jordan can easily meet these requirements. With respect to the first factor, Mr. Jordan notes that Borakk himself is responsible for the fact that he cannot be given prompt notice of these proceedings. Borakk's rights must be balanced against his own culpability for rendering service difficult, as well as against the urgency of Mr. Jordan's request. The longer Borakk is given to seek to quash the subpoenas, the more likely it will be that the ISP logs necessary to trace his activities back to an identity and location will be lost. Mr. Jordan proposes the following procedure to accommodate Borakk's notice. Even with respect to the requested Order To Show Cause, Borakk has purposefully made it impossible for Mr. Jordan to serve him. Nonetheless, in order to provide some reasonable possibility of notice, Mr. Jordan will post a message on the LLLI bulletin board on the Raging Bull service. This board is the board where Borakk has posted the greatest number of messages in the past. The message will be titled "Borakk Subpoena," and will contain a link that, when selected, will provide access to electronic copies of the Order to Show Cause and Mr. Jordan's supporting papers. Thus, Borakk, who in the past has signed on to the LLLI board several times a day to post and respond to messages, will have notice of the Order to Show Cause and will have ample opportunity to resist the resulting subpoenas, even with the expedited production date of seven business days.

With respect to the second *Dendrite* factor, Mr. Jordan has set forth above and in his Verified Complaint the exact defamatory statements made by Borakk.

Addressing the third factor, Mr. Jordan has pled a prima facie cause of action for defamation against Borakk, more than sufficient to withstand a motion to dismiss for failure to

state a claim. In order to make a prima facie case for defamation, and withstand a motion to dismiss, a plaintiff must show that (a) the defendant made a statement, concerning the plaintiff, to a third party that was published in writing or some other equivalent medium, or made orally; (b) the statement could damage the plaintiff's reputation in the community; (c) the defendant was at fault in making the statement; and (d) the statement either caused the plaintiff economic loss, or is actionable without proof of economic loss. *Ravnikar v. Bogojavlensky*, 438 Mass. 627, 629, 782 N.E.2d 508, 510-11 (Mass. 2003).

Statements that constitute libel, statements that charge the plaintiff with a crime, and statements that may prejudice the plaintiff's profession or business are defamatory *per se* and are all actionable without proof of economic loss. *Id.* at 630; *see also Shafir v. Steele*, 431 Mass. 365, 373, 727 N.E.2d 1140, 1146 (Mass. 2000). In such cases, the plaintiff may recover for non-economic losses, including emotional injury and damage to reputation. *Ravnikar*, 438 Mass. at 630.

Here, the defendant, Borakk, published false statements, in writing, concerning Mr. Jordan to third parties on an Internet bulletin board. Verified Complaint ¶¶ 11-28 and Exs A-H. The statements specifically refer to Mr. Jordan as a "criminal" and state that he engaged in fraudulent schemes to illegally manipulate stock prices. Such statements clearly are damaging to Mr. Jordan's personal and professional reputation, as Mr. Jordan is in the business of investing in early-stage businesses to help them become successful publicly-traded companies. Investors will be loathe to contribute capital to Mr. Jordan's start-up businesses if they think that he is dishonest and engages in fraudulent stock manipulation schemes. Indeed, there is evidence that Mr. Jordan is already losing potential business opportunities as a direct result of Borakk's false and defamatory statements. Verified Complaint ¶ 33.



It is clear that Borakk was at fault in making these statements because he intentionally posted the statements on various Internet bulletin boards under his screen name. Furthermore, Mr. Jordan does not have to prove economic loss because the statements charge Mr. Jordan with the crime of fraud. *See Shafir*, 431 Mass. at 373 (stating that “imputation of a crime is defamatory *per se*.”). The statements are also prejudicial to Mr. Jordan’s business. *See Ravnika*r, 438 Mass. at 631 (“One who publishes a slander that ascribes to another conduct, characteristics or a condition that would adversely affect his fitness for the proper conduct of his lawful business, trade or profession . . . is subject to liability without proof of special harm.”) (citations and quotations omitted). Moreover, the defamatory statements constitute libel because they are published in writing. *Louka v. Park Entertainment, Inc.*, 294 Mass. 268, 271 (1936). For all of these reasons, the statements made about Mr. Jordan are defamatory *per se*, and therefore Mr. Jordan need not prove economic loss to state a claim for defamation. Mr. Jordan has easily stated a claim for defamation.

Finally, with respect to the fourth *Dendrite* factor, the Court “must balance the defendant’s First Amendment right of anonymous free speech against the strength of the prima facie case presented and the necessity for the disclosure of the anonymous defendant’s identity to allow the plaintiff to properly proceed.” *Dendrite*, 342 N.J. Super. at 142. While anonymous speech is generally protected by the First Amendment, such speech is not protected if it is unlawful. *See id.* at 151. Thus, First Amendment interests should not allow Borakk to use anonymity to evade liability for his defamatory statements.

Here, the strength of Mr. Jordan’s case and his need to quickly identify Borakk strongly outweigh Borakk’s general right of anonymous speech. Mr. Jordan has presented concrete evidence sufficient to withstand a motion to dismiss on his claim for libel. Furthermore, Mr.

Jordan will be completely unable to prosecute his case without the requested discovery. It would simply be impossible for Mr. Jordan to determine the identity of Borakk without first obtaining information from Lycos and then from the ISP providing Internet access to Borakk.

In closing, the Internet is a vast source of information and a venue for people to communicate about almost any topic. The Internet allows people to communicate freely and anonymously, without fear of retaliation, social ostracism, or simply recognition, and thus fosters creativity. However, the Internet should not be a place where people can make false and defamatory statements that are harmful to others without fear of consequences. Moreover, the defamatory statements made in this case appear to be made, in part, for the purpose of fraudulently manipulating stock prices. As such, it is in the public's interest to ensure that Mr. Jordan may be allowed to pursue relief from such statements.

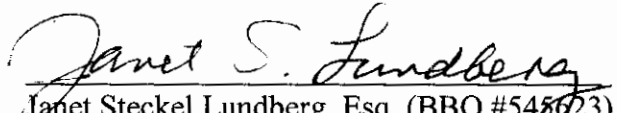
### **CONCLUSION**


For the foregoing reasons, Mr. Jordan respectfully requests that this Court issue the Order to Show Cause attached as Exhibit 1 to Plaintiff's Motion. In addition, Mr. Jordan respectfully requests that, after giving Defendant notice and an opportunity to respond as set forth in the Order to Show Cause, the Court issue the proposed Expedited Pre-Service Discovery Order (attached as Exhibit 2 to Plaintiff's Motion) and grant Plaintiff expedited, pre-service discovery from Lycos, and the ISP providing Internet service to Borakk.

Respectfully submitted,

TRENT JORDAN

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Dated: July 22, 2005

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UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

TRENT JORDAN,

Plaintiff,

v.

JOHN DOE 1, aka BORAKK,

Defendant.

Civil Action No. 05-cv-11452 (DPW)

**DECLARATION OF PAUL M. FAKLER IN SUPPORT OF  
MOTION FOR ORDER TO SHOW CAUSE**

PAUL M. FAKLER, declares, pursuant to 28 U.S.C. § 1746, as follows:

1. I am associated with the law firm of Thelen Reid & Priest LLP, counsel for Plaintiff Trent Jordan in the above-captioned case. I make this affidavit in support of Plaintiff's Ex Parte Motion For An Order To Show Cause.

2. My practice is specialized in intellectual property and Internet-related law. In my capacity as an attorney, I have worked on many cases involving Internet technologies and businesses, and have worked with numerous colleagues engaged in the same types of cases.

3. I am an executive officer of the New York State Bar Association Intellectual Property Law Section. In that capacity, I routinely organize, moderate and speak at seminars concerning the substantive and procedural law of Internet-related cases.

4. Prior to law school, I worked in the multimedia software development field, and have been involved with personal and commercial use of the Internet since the early 1990s.

5. By virtue of my professional experience, I have become very familiar with Internet technologies, the businesses and policies of various types of Internet Service Providers



(“ISPs”), and the legal issues associated therewith.

6. The facts underlying Mr. Jordan’s libel claim are set forth in detail in the Verified Complaint.

7. The Defendant in this case has posted various defamatory statements about Mr. Jordan on the Internet, on electronic bulletin boards controlled and maintained by Lycos, Inc. (“Lycos”) as part of their “Raging Bull” service. I have personally created an account with Lycos and its Raging Bull service, and am familiar with the workings of these bulletin boards and the user registration process.

8. When a user joins the service by registering with Lycos, the user has the opportunity, but not the obligation, to provide personally identifying information in a user profile associated with the registered user name. Although a user must supply an Internet e-mail address, there is no verification process for that e-mail address, so that any user may submit a false e-mail address without any negative consequence.

9. When the Defendant registered under the user name Borakk, he did not provide any identifying information in his publicly available user profile, and the e-mail address he provided during the registration is omitted from this profile. Moreover, even assuming that e-mail address was valid, Lycos will not voluntarily provide any user information to third parties other than in response to a subpoena. Thus, Mr. Jordan cannot possibly identify Borakk without the assistance of the Court.

10. Borakk proceeded to publish the various statements that are the subject of this lawsuit. Due to Borakk’s decision not to provide any identifying information, the defamatory postings are effectively anonymous, and Mr. Jordan has had no way to determine Borakk’s true identity. Without that identifying information, Mr. Jordan cannot serve the Verified Complaint or

obtain relief in any other way.

11. In order to obtain the necessary information about Borakk, Mr. Jordan must obtain discovery in two different steps. This is a procedure that is now commonly used in anonymous Internet defamation cases. First, Mr. Jordan must serve a subpoena on Lycos to obtain any identifying information Lycos has with respect to Borakk. Since his objective was to remain anonymous and unaccountable for his actions, it is unlikely that Borakk gave Lycos any accurate information. However, ISPs such as Lycos maintain records, or logs, tracking the activities of registered members. That information includes the Internet Protocol Address ("IP Address") associated with the user, and the times that the user was logged in from that IP Address. An IP Address is a numerical string that corresponds to the user's individual point of Internet access, usually a specific computer connected to the Internet.

12. If Mr. Jordan obtains one or more IP Addresses used by Borakk, each IP Address may be traced back to a particular ISP that assigned the IP Address to one of its Internet access subscribers. Until we know the IP Address(es) associated with Borakk, we cannot know which ISPs we will have to subpoena in the next step. In that next step, we must provide the appropriate ISPs with Borakk's IP Addresses and obtain the identifying information of the users who were assigned those IP Addresses at the relevant times. This should provide us with sufficient information to ascertain the Defendant's identity and location so that we may serve the Verified Complaint.

13. There are generally two methods of assigning an IP Address to a specific computer on the Internet. These methods vary, depending on the ISP through which the user gets Internet Access. In the first method, static IP Addressing, the user is assigned one IP Address and retains that IP Address every time he or she logs onto the Internet. This method is more

expensive because it requires the ISP to have at least one dedicated IP Address for each subscriber. To conserve IP Addresses, some ISPs use another method, dynamic IP Addressing, in which each time the use logs onto the Internet he or she is assigned a different IP Address from a continually recirculation pool of IP Addresses.

14. Because much more data is generated when tracking dynamically assigned IP Addresses, ISPs using that method do not always retain their IP Address logs for very long. Although the retention times vary among ISPs, typically the logs are not kept beyond one to three months.

15. Thus, if Borakk's ISP uses dynamic IP Addressing, we must obtain the information from that ISP as quickly as possible, before those logs are destroyed.

16. I declare under penalty of perjury that the foregoing is true and correct.

Dated: July 21, 2005  
New York, New York

A handwritten signature in black ink, appearing to read 'P. Fakler', written over a horizontal line.

Paul M. Fakler

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## SCHEDULE A

### DEFINITIONS AND INSTRUCTIONS

As used herein, the following terms shall have the following meanings:

(a) **Documents.** As used herein, the term "documents" is defined to be synonymous in meaning and equal in scope to the usage of the term in Federal Rule of Civil Procedure 34(a), including, without limitation, writings, printouts, photographs, identification cards, drivers licenses, electronic or computerized data compilations; each draft or non-identical copy is to be considered a separate document under this term. Moreover, the term "documents" includes, without limitation: all writings of any kind, regardless of origin or location, to which the party to whom this document request is addressed has, or has had, access, including the originals and all non-identical copies or versions, whether different from the originals by reason of any notation made on such copies or otherwise, including without limitation correspondence, communications, contracts, agreements, memoranda, emails, notes, diaries, statistics, letters, telegrams, minutes, contracts, reports, studies, checks, statements, receipts, returns, summaries, pamphlets, books, prospectuses, certificates, drawings, plans, interoffice and intraoffice communications, or offers; notations in any form made of conversations, telephone calls, meetings or other communications; bulletins, printed matter (including newspapers, magazines and other publications, and articles and clippings therefrom), press releases, computer printouts, teletypes, telecopies, invoices, ledgers, worksheets, identification cards, driver's licences (and all drafts, alterations, modifications, changes and amendments of any of the foregoing), , graphic or aural records or representations of any kind (including without limitation photographs, charts, graphs, and microfiche,



microfilm, videotape, or film recordings) and electronic, optical, digital, mechanical or electrical records, databases or representations of any kind (no matter on what type of media stored, including without limitation audio and/or video tapes, cassettes, discs, magnetic tape, CD-ROMs, DVD's, recordings, computer tapes, cassettes or discs), or transcriptions thereof.

(b) **Concerning.** The term "concerning" means relating to, referring to, describing, evidencing or constituting.

(c) You are instructed either to produce documents as they are kept in the usual course of business or to produce documents organized and labeled to correspond with the categories in this Request, except that all documents produced in response to any category of this Request seeking "communications" shall be organized and labeled to correspond with those categories. In addition, documents are to be produced in full and unexpurgated form, including any and all copies of documents that bear any note, mark or notation not existing in the original.

(d) If any document identified in response to a specific request for documents herein relates in any way to a meeting or to any conversation, all participants in the meeting or conversation are to be identified.

(e) Unless otherwise indicated, the time period covered by these Document Requests is from January 2005 to the present.

(f) If any document covered by this Request is withheld by reason of a claim of privilege, work product or other ground of nonproduction, a list is to be furnished at the time the documents are produced identifying any such document for which the privilege is claimed ("List of Privileged Documents"), specifically by its nature

(e.g., letter, memorandum, etc.), together with the following information with respect to any such document withheld: author(s); recipient(s); sender(s); indicated or blind copies; date; subject matter; basis on which the privilege is claimed; number of pages; and the paragraph(s) of this Request to which such document relates.

(g) If a portion of an otherwise responsive document contains information subject to a claim of privilege, only those portions of the documents subject to the claim of privilege shall be deleted or redacted from the document and the rest of the document shall be produced. If any portion of an otherwise responsive document is deleted or redacted from the document, those portions are to be added to the List of Privileged Documents.

(h) In the event that any document called for by this Request has been destroyed, lost, discarded or otherwise disposed of, any such document is to be identified as completely as possible, including, without limitation, the following information: author(s), recipient(s); sender(s); subject matter; date prepared or received; date of disposal; manner of disposal, person(s) authorizing the disposal; person(s) currently in possession of copies of the document; and person(s) disposing of the document.

(i) This Request shall be deemed continuing. The producing party is required to promptly supply supplemental production in the event that the producing party may become aware of additional responsive documents during the pendency of this action.

#### DOCUMENTS REQUESTED

1. Any and all information and/or documents (whether in paper, digital, electronic, or stored on other media or another format) concerning the identification of

the persons or entities using user name "borakk" (the "User Name") or accounts related to that User Name, including without limitation, documents concerning the true name, location, IP address, mailing address, phone number, and other identifying information that may lead to the discovery of same, including without limitation: (1) any user logs concerning the User Name, including without limitation, any and all IP addresses or dial-up phone numbers used (either dialed to or dialed from) which were used by any person or entity in connection with the User Name, (2) any and all user registration information or account information pertaining to the User Name, including without limitation, any user agreements, applications, registration forms, correspondence, e-mails, names, addresses, phone numbers, e-mail addresses, copies of checks or cancelled checks or any other method of payment, such as credit/debit card account information or PayPal account information, (3) any Internet Service Providers ("ISP") and/or Online Service Providers ("OSP") used by the User Name, and/or any aliases used by the User Name, including any such ISP's, OSP's or other servers or computers used during the transmission of any of the communications or e-mails sent or received by the User Name.

2. For each and every IP address used by any person or entity in connection with the User Name identified in response to Request No. 1, above, documents sufficient to identify each and every other user name used in connection with such IP address (the "Additional User Names."

3. For each and every Additional User Name identified in response to Request No. 2, any and all information and/or documents (whether in paper, digital, electronic, or stored on other media or another format) concerning the identification of the persons or entities using the Additional User Names or accounts related to the

Additional User Names, including without limitation, documents concerning the true name, location, IP address, mailing address, phone number, and other identifying information that may lead to the discovery of same, including without limitation: (1) any user logs concerning the Additional User Names, including without limitation, any and all IP addresses or dial-up phone numbers used (either dialed to or dialed from) which were used by any person or entity in connection with the Additional User Names, (2) any and all user registration information or account information pertaining to the Additional User Names, including without limitation, any user agreements, applications, registration forms, correspondence, e-mails, names, addresses, phone numbers, e-mail addresses, copies of checks or cancelled checks or any other method of payment, such as credit/debit card account information or PayPal account information, (3) any Internet Service Providers ("ISP") and/or Online Service Providers ("OSP") used by the Additional User Names, and/or any aliases used by the Additional User Names, including any such ISP's, OSP's or other servers or computers used during the transmission of any of the communications or e-mails sent or received by the Additional User Names.





## SCHEDULE A

### DEFINITIONS AND INSTRUCTIONS

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microfilm, videotape, or film recordings) and electronic, optical, digital, mechanical or electrical records, databases or representations of any kind (no matter on what type of media stored, including without limitation audio and/or video tapes, cassettes, discs, magnetic tape, CD-ROMs, DVD's, recordings, computer tapes, cassettes or discs), or transcriptions thereof.

(b) **Concerning.** The term "concerning" means relating to, referring to, describing, evidencing or constituting.

(c) You are instructed either to produce documents as they are kept in the usual course of business or to produce documents organized and labeled to correspond with the categories in this Request, except that all documents produced in response to any category of this Request seeking "communications" shall be organized and labeled to correspond with those categories. In addition, documents are to be produced in full and unexpurgated form, including any and all copies of documents that bear any note, mark or notation not existing in the original.

(d) If any document identified in response to a specific request for documents herein relates in any way to a meeting or to any conversation, all participants in the meeting or conversation are to be identified.

(e) Unless otherwise indicated, the time period covered by these Document Requests is from January 2005 to the present.

(f) If any document covered by this Request is withheld by reason of a claim of privilege, work product or other ground of nonproduction, a list is to be furnished at the time the documents are produced identifying any such document for which the privilege is claimed ("List of Privileged Documents"), specifically by its nature

(e.g., letter, memorandum, etc.), together with the following information with respect to any such document withheld: author(s); recipient(s); sender(s); indicated or blind copies; date; subject matter; basis on which the privilege is claimed; number of pages; and the paragraph(s) of this Request to which such document relates.

(g) If a portion of an otherwise responsive document contains information subject to a claim of privilege, only those portions of the documents subject to the claim of privilege shall be deleted or redacted from the document and the rest of the document shall be produced. If any portion of an otherwise responsive document is deleted or redacted from the document, those portions are to be added to the List of Privileged Documents.

(h) In the event that any document called for by this Request has been destroyed, lost, discarded or otherwise disposed of, any such document is to be identified as completely as possible, including, without limitation, the following information: author(s), recipient(s); sender(s); subject matter; date prepared or received; date of disposal; manner of disposal, person(s) authorizing the disposal; person(s) currently in possession of copies of the document; and person(s) disposing of the document.

(i) This Request shall be deemed continuing. The producing party is required to promptly supply supplemental production in the event that the producing party may become aware of additional responsive documents during the pendency of this action.

#### DOCUMENTS REQUESTED

1. Documents (whether in paper, digital, electronic, or stored on other media or another format) sufficient to identify the person(s) or entities ("Users") using the

following IP addresses at the referenced times (the "IP Addresses") by any and all associated names, user names, addresses, telephone numbers, e-mail addresses and any other points of identification of the Users:

[IP Address Data Obtained From Lycos Here]

Including without limitation (1) any user logs concerning the IP Addresses; and (2) any and all user registration information or account information pertaining to the User, including without limitation, any user agreements, applications, registration forms, correspondence, e-mails, names, addresses, phone numbers, e-mail addresses, copies of checks or cancelled checks or any other method of payment, such as credit/debit card account information or PayPal account information.

**D**

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

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2005 JUL -8 P 3:04

U.S. DISTRICT COURT  
DISTRICT OF MASS.

TRENT JORDAN,

Plaintiff,

v.

JOHN DOE 1, aka BORAKK,

Defendant.

05 - 11452 DPW  
Civil Action No.

**VERIFIED COMPLAINT**

Plaintiff Trent Jordan, by and through his undersigned counsel, as and for his Verified Complaint against Defendant John Doe 1, aka "Borakk" ("Borakk"), alleges, upon information and belief as to facts concerning others and upon personal knowledge as to facts concerning himself, as follows:

**INTRODUCTION**

1. In this action, Plaintiff seeks preliminary and permanent injunctive relief, as well as compensatory damages, for Defendant's libelous postings to various Internet bulletin boards, in which Defendant, hiding behind the anonymity of his screen-name "Borakk," makes numerous false and disparaging claims about Plaintiff, including accusing Plaintiff of fraud, stock manipulation and other illegal activities.

**PARTIES**

2. Plaintiff, Trent Jordan, is an individual citizen of Canada, residing in Vancouver, British Columbia.



UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MASSACHUSETTS

TRENT JORDAN,

Plaintiff,

v.

JOHN DOE 1, aka BORAKK,

Defendant.

05 - 11452 DPW  
Civil Action No.

**VERIFIED COMPLAINT**

Plaintiff Trent Jordan, by and through his undersigned counsel, as and for his Verified Complaint against Defendant John Doe 1, aka "Borakk" ("Borakk"), alleges, upon information and belief as to facts concerning others and upon personal knowledge as to facts concerning himself, as follows:

**INTRODUCTION**

1. In this action, Plaintiff seeks preliminary and permanent injunctive relief, as well as compensatory damages, for Defendant's libelous postings to various Internet bulletin boards, in which Defendant, hiding behind the anonymity of his screen-name "Borakk," makes numerous false and disparaging claims about Plaintiff, including accusing Plaintiff of fraud, stock manipulation and other illegal activities.

**PARTIES**

2. Plaintiff, Trent Jordan, is an individual citizen of Canada, residing in Vancouver, British Columbia.

3. Defendant Borakk is an individual who has entered into an agreement with Lycos, Inc., ("Lycos") a corporation with its principal place of business in Waltham, Massachusetts, for membership in its Raging Bull service under the screen name "Borakk."

4. Defendant Borakk, pursuant to that membership agreement, proceeded to post defamatory statements concerning Mr. Jordan on various bulletin boards maintained by Lycos and Raging Bull on computer servers located in Waltham, Massachusetts and available to the public, nationally and internationally, through the Internet.

#### **JURISDICTION AND VENUE**

5. This Court has jurisdiction over this action pursuant to 28 U.S.C. § 1332(a) in that this is a civil action between a citizen of a State and a citizen of a foreign state, in which the amount in controversy exceeds the sum or value of \$75,000, exclusive of interest and costs.

6. Venue is proper in this judicial district pursuant to 28 U.S.C. § 1391(a) because a substantial part of the events giving rise to Plaintiff's claim arose in this district. Venue is also proper in this district pursuant to 28 U.S.C. § 1391(a) because Borakk is subject to personal jurisdiction in this district, as Plaintiff's claim arises directly out of Borakk's contacts with Lycos in this District, and at this juncture, due to Borakk's willful anonymity, there is no other district in which this action may otherwise be brought.

#### **FACTS**

7. Plaintiff, Mr. Jordan, is an individual investor and venture capitalist. He frequently invests in early-stage businesses, providing them the capital to mature into successful, publicly traded companies.

8. Defendant is an individual who established an account with Lycos under the assumed screen-name "Borakk." Borakk's true name, identity and contact information is

presently unknown to Plaintiff because Borakk chose not to list any of that information in the profile associated with his screen name. Plaintiff, thus, has been forced to sue Borakk by his anonymous screen name. When Borakk's true identity is ascertained, Plaintiff will seek leave to amend this Complaint accordingly.

9. The ascendancy of the Internet has provided a medium in which individuals may communicate with others around the world, instantly and anonymously. Unfortunately, Borakk has used this tool, and the anonymity permitted by bulletin board service providers such as Lycos, to fabricate, print and publish defamatory lies about individuals and companies with little or no risk of consequence. Internet bulletin boards relating to investing, such as Raging Bull, have become a hotbed of such anonymous defamation.

10. As part of its Raging Bull service, Lycos provides electronic bulletin boards for the discussion of investing in various publicly traded companies and allows registered users to post comments to those boards. Beginning in early June, 2005, Borakk began posting comments in various different bulletin boards, in which he made numerous false and defamatory statements concerning Mr. Jordan.

11. For example, on June 4, 2005, Borakk posted a message on the GOCM bulletin board (for a company named Geocom Resources), a true and correct copy of which is annexed hereto as Exhibit A, containing the following false statement about Mr. Jordan: after quoting another anonymous false allegation that Mr. Jordan was responsible for destroying the value of certain company through fraudulent stock manipulation, Borakk states, "Nice guy, the criminal left GOCM in the same condition."

12. The statement concerning Mr. Jordan set forth in Paragraph 11 hereof and published on the GOCM bulletin board is false. Mr. Jordan has never been responsible for any harm to Geocom Resources' stock through fraudulent stock manipulation or otherwise.

13. On June 6, 2005, Borakk posted a message on the CYXP board (for a company named Cityxpress), a true and correct copy of which is annexed hereto as Exhibit B, containing the following false statement about Mr. Jordan: "Trent Jordan and his gang puts these scams together owning all of the free trading stock. They pay \$1M to \$2M for massive promotional campaign (pump BLLD to \$6) and dump all their paper. The idiots buying into the pump have no idea who is selling them their stock. Jordan walks away with millions in trading profits leaving a broken company to struggle on its own. BLLD is one of many Jordan pump and dumps. WKWG/CYXP, GOCM, IDCO were others and his current scam is LLLI." The phrase "pump and dump" is a term used in the investing community to mean an illegal scheme for making money by fraudulently manipulating stock prices; the schemer persuades other people to buy the stock and then sells it himself as soon as the price of the stock rises.

14. The statement concerning Mr. Jordan set forth in Paragraph 13 hereof is false. Mr. Jordan has not committed fraud or engaged in pumping and dumping the stock of the companies identified therein.

15. Later on June 6, 2005, Borakk again posted a message on the CYXP board, a true and correct copy of which is annexed hereto as Exhibit C, containing the following false statement about Mr. Jordan: "Unfortunately, honest guys trying to build real companies get conned by criminals like Trent Jordan and suffer for many many years as a result. The original Welcome to Search people should have entered into a joint venture with the WKWG pub co rather than letting the deal be acquired by a company with a maniac like Jordan involved. If they

had done this they could have cancelled the deal after Jordan blew it up and kept it private or found a more reputable pub co to deal with.”

16. The statement concerning Mr. Jordan set forth in Paragraph 15 hereof is false. Mr. Jordan has never been tried or convicted of any crime, and did not “blow up” any deal relating to WKWG (Welcome To Search Engine, Inc.).

17. On June 10, 2005, Borakk posted a message on the IDCO board (for a company named Interac Data), a true and correct copy of which is annexed hereto as Exhibit D, containing the following false statement about Mr. Jordan: “Trend [sic] Jordan pumped and dumped heavy in February, IDCO never recovered after that. In case you dummies don’t know, Trent Jordan put this whole scam together so he could dump free trading stock!”

18. The statement concerning Mr. Jordan set forth in Paragraph 17 hereof is false. Mr. Jordan did not engage in pumping and dumping IDCO stock, and was not involved in any scam related to IDCO.

19. On June 17, 2005, Borakk posted a message on the LLLI board (for a company named Lamperd Less Lethal, Inc.), a true and correct copy of which is annexed hereto as Exhibit E, containing the following false statement about Mr. Jordan: “Trent Jordan’s boiler room got snuffed out, they are under the crushing weight of the law.” The term “boiler room” is a term used in the investing community to describe an enterprise that often is operated out of inexpensive, low-rent quarters (hence the term “boiler room”), that uses false or misleading information and high pressure sales tactics (generally over the telephone) to solicit generally unsophisticated investors.



20. The statement concerning Mr. Jordan set forth in Paragraph 19 hereof is false. Mr. Jordan has never operated a “boiler room” and his business dealings have never been the subject of civil or criminal legal proceedings.

21. Also on June 17, 2005, Borakk posted another message on the LLLI board, a true and correct copy of which is annexed hereto as Exhibit F, containing the following false statement about Mr. Jordan: “Trent Jordan is nothing but a lying manipulative penny stock pumping and dumping scumbag!”

22. The statement concerning Mr. Jordan set forth in Paragraph 21 hereof is false. Mr. Jordan has not engaged in pumping and dumping, or other fraudulent activities.

23. On June 18, 2005, Borakk posted a similar message on the LLLI board, a true and correct copy of which is annexed hereto as Exhibit G, in which he made the following false statement about Mr. Jordan: “Trent Jordan is nothing but a lying manipulative penny stock pumping and dumping scumbag crook!”

24. The statement concerning Mr. Jordan set forth in Paragraph 23 hereof is false. Mr. Jordan has not engaged in pumping and dumping or other fraudulent activities, and is not a criminal.

25. On June 20, 2005, Borakk posted another similar message on the LLLI board, a true and correct copy of which is annexed hereto as Exhibit H, containing the following false statement about Mr. Jordan: “Trent Jordan is nothing but a despicable lying manipulative penny stock pumping and dumping scumbag!”

26. The statement concerning Mr. Jordan set forth in Paragraph 25 hereof is false. Mr. Jordan has not engaged in pumping and dumping, or other fraudulent activities.



27. The statements described above are but a few of many messages posted by Borakk since early June, 2005, containing false, disparaging and defamatory statements about Mr. Jordan. Borakk continues to post such messages every day up through the filing of this action.

28. Throughout these postings, which range across bulletin boards devoted to several different companies, including companies with which Mr. Jordan has no relationship, Borakk maliciously and falsely states that Mr. Jordan has been and is involved in various fraudulent stock manipulation schemes and describes him as a liar and criminal who has been driven out of business by legal authorities. These defamatory statements are all untrue.

29. Borakk trades in the stocks on which he comments, including short-selling these stocks, and thus profits from the movement of stock prices caused by his defamatory statements. Borakk, thus, uses his false and defamatory statements concerning Mr. Jordan to conduct his own fraudulent stock manipulation scheme.

**CLAIM FOR RELIEF**  
(Libel)

30. Plaintiff incorporates by reference each and every allegation contained in paragraphs 1 through 29 above as if set forth here in full.

31. Borakk published the false and defamatory statements described above on the Internet, intending that they reach as wide an audience of securities purchasers and sellers, securities professionals, early-stage companies and other information seekers as possible, both in the United States and throughout the world.

32. Mr. Jordan's reputation, property and business have been, and continue to be, irreparably harmed as a result of Borakk's false and defamatory statements, which impugn Mr.

Jordan's honesty, integrity, trustworthiness, and other characteristics relevant to his success as a venture capital investor.

33. Borakk's false accusations that Mr. Jordan has engaged in criminal activities, including fraudulent stock manipulation, and in particular that Mr. Jordan has intentionally harmed various companies in which he has invested, are having a devastating effect on Mr. Jordan's ability to continue in his investing business. These false accusations are designed to interfere, and are interfering, with Mr. Jordan's ability to attract new companies in which to invest. Recently, persons involved with companies in which Mr. Jordan is attempting to invest have indicated their reservations in dealing with him in light of false statements contained in Borakk's postings.

34. Borakk's false and defamatory statements have caused Mr. Jordan mental pain and suffering, including outrage and anger upon reading the libelous statements.

35. Borakk's false and defamatory statements constitute libel *per se*, in that they directly or indirectly charge Mr. Jordan with criminal and otherwise illegal, immoral and improper activities, and tend to injure Mr. Jordan in his trade or business of venture capital investing.

36. Borakk made the false and defamatory statements with knowledge of, or reckless disregard for, the falsity of those statements, with the intent to harm Mr. Jordan, and with the intent to profit personally from changes in stock prices caused by those statements.

#### **PRAYER FOR RELIEF**

WHEREFORE, Plaintiff prays for judgment and relief as follows:

A. A preliminary and permanent injunction: (i) prohibiting Defendant from further publication of his defamatory statements; and (ii) directing Defendant to cooperate with

Plaintiff in seeking removal of all existing defamatory statements from the Raging Bull bulletin boards or any other media of publication;

- B. An award of compensatory damages, including for mental pain and suffering and harm to Plaintiff's reputation, in an amount to be determined at trial;
- C. An award of pre-judgment interest;
- D. An award of costs and attorneys' fees; and
- E. Such other and further relief as the Court may deem just and proper.

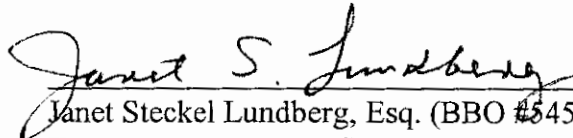
**JURY DEMAND**

Plaintiff demands a trial by jury as to all claims so triable.

Respectfully submitted,

TRENT JORDAN

By his attorneys,

  
Janet Steckel Lundberg, Esq. (BBO #545623)

KROKIDAS & BLUESTEIN LLP  
600 Atlantic Avenue  
Boston, MA 02210  
(617) 482-7211

Of Counsel:

Paul A. Winick, Esq.  
Paul M. Fakler, Esq.  
THELEN REID & PRIEST, LLP  
875 Third Avenue  
New York, NY 10022

Dated: July 8, 2005

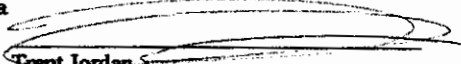
**VERIFICATION**

I, Trent Jordan, declare, pursuant to 28 U.S.C § 1746, as follows:

I hereby certify that I have read the foregoing Verified Complaint, that I have personal knowledge of the facts alleged therein, and that they are true upon my knowledge, except where stated upon information and belief, which facts I believe to be true.

I declare under penalty of perjury under the laws of the United States of America that the foregoing is true and correct.

Executed: July 24, 2005  
Vancouver, British Columbia

  
Trent Jordan

## **EXHIBIT A**

Raging Bull: Post 52 on GOCM Message Board

Page 1 of 2

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Trent Jordan, from the CYXP board:

"Trent Jordan took wicked wings public. Locked in all the seed capital shares for twelve months. Drove the price up to eight dollars on a massive promotional campaign that was supposed to take place over a year but instead took place over a couple of months, and then dumped all his shares before seed capital became free trading, and shorted the share price down to ten cents and walked away with millions of dollars in investors money. He did the same thing to several other foolish companies that subsequently went under. Six years later we are still paying for that crucial mistake."

Nice guy, the criminal left GOCM in the same condition!

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Board	Ne
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<a href="#">CYXP</a>	959
<a href="#">FDEI</a>	199
<a href="#">GOCM</a>	
<a href="#">IDCO</a>	94
<a href="#">LLLI</a>	70
<a href="#">SVSE</a>	172



Raging Bull: Post 52 on GOCM Message Board

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## **EXHIBIT B**

Raging Bull: Post 9558 on CYXP Message Board

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By: borakk

Msg. 9558 of 9598

06 Jun 2005, 01:04 PM EDT

(This msg. is a reply to 9557 by sete10.)

Jump to msg. #  [Go](#)

There were never "hundreds of seed capital shareholders". Trent Jordan and his gang puts these scams together owning all of the free trading stock. They pay \$1M to \$2M for massive promotional campaign (pump BLLD to \$6) and dump all their paper. The idiots buying into the pump have no idea who is selling them their stock. Jordan walks away with millions in trading profits leaving a broken company to struggle on its own. BLLD is one of many Jordan pump and dumps. WKWG/CYXP, GOCM, IDCO were others and his current scam is LLLI.

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Board	New
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CYXP	4
FDEI	199
GOCM	1
IDCO	94
LLLI	70
SVSE	171

## **EXHIBIT C**

Raging Bull: Post 9559 on CYXP Message Board

Page 1 of 2

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06 Jun 2005, 01:10 PM EDT

Msg. 9559 of 9598

(This msg. is a reply to [9557](#) by [sete10.](#))Jump to msg. #  [Go](#)

Unfortunately honest guys trying to build real companies get conned by criminals like Trent Jordan and suffer for many many years as a result. The original Welcome to Search people should have entered into a joint venture with the WKWG pub co rather than letting the deal be acquired by a company with a maniac like Jordan involved. If they had done this they could have cancelled the deal after Jordan blew it up and kept it private or found a more reputable pub co to deal with.

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## **EXHIBIT D**

Raging Bull: Post 930 on IDCO Message Board

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INTERAC DATA (RB: IDCO)

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10 Jun 2005, 10:59 AM EDT

Msg. 930 of 949

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Trend Jordan pumped and dumped heavy in February, IDCO never recovered after that. In case you dummies don't know, Trent Jordan put this whole scam together so he could dump free trading stock!

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Raging Bull: Post 930 on IDCO Message Board

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By: borakk

Msg. 652 of 660

17 Jun 2005, 02:44 PM EDT

(This msg. is a reply to 651 by bruisers.)

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Trent Jordan's boiler room got snuffed out, they are under the crushing weight of the law. Barry Lamperd is left holding the bag, without a clue how to run a public company. I bet this POS gets delisted for not filing its next 10Q, you can bet Barry's right on top of it!

LLLI 10Q: For the past three months ending June 31, 2005 "its never made a dime in its life"

BWAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAAA!

*(Voluntary Disclosure: LT Rating- Strong Sell)*

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By: **bruisers**

17 Jun 2005, 01:52 PM EDT

Msg. 651 of 660

(This msg. is a reply to 650 by acoz0.)

Jump to msg. #  [Go](#)

uhhhhh....that may explain why barry and his foe are on here....begging for the bashers to leave and just hoping that they too will be able to keep this up till they get a chance to cash in.....nice, looks like it may be backfiring in their a s s.

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3:59 PM ET

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+0.02 (+0.87 %)

Volume: 364

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Raging Bull: Post 637 on LLLI Message Board

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17 Jun 2005, 11:00 AM EDT

Msg. 637 of 660

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Trent Jordan, from the CYXP board:

"Trent Jordan took wicked wings public. Locked in all the seed capital shares for twelve months. Drove the price up to eight dollars on a massive promotional campaign that was supposed to take place over a year but instead took place over a couple of months, and then dumped all his shares before seed capital became free trading, and shorted the share price down to ten cents and walked away with millions of dollars in investors money. He did the same thing to several other foolish companies that subsequently went under. Six years later we are still paying for that crucial mistake."

Trent Jordan is nothing but a lying manipulative penny stock pumping and dumping scumbag!

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+0.02 (+0.87 %)

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18 Jun 2005, 11:45 AM EDT

Msg. 681 of 726

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Trent Jordan, from the CYXP board:

"Trent Jordan took wicked wings public. Locked in all the seed capital shares for twelve months. Drove the price up to eight dollars on a massive promotional campaign that was supposed to take place over a year but instead took place over a couple of months, and then dumped all his shares before seed capital became free trading, and shorted the share price down to ten cents and walked away with millions of dollars in investors money. He did the same thing to several other foolish companies that subsequently went under. Six years later we are still paying for that crucial mistake."

Trent Jordan is nothing but a lying manipulative penny stock pumping and dumping scumbag crook!

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By: borakk

20 Jun 2005, 11:02 AM EDT

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Trent Jordan, from the CYXP board:

"Trent Jordan took wicked wings public. Locked in all the seed capital shares for twelve months. Drove the price up to eight dollars on a massive promotional campaign that was supposed to take place over a year but instead took place over a couple of months, and then dumped all his shares before seed capital became free trading, and shorted the share price down to ten cents and walked away with millions of dollars in investors money. He did the same thing to several other foolish companies that subsequently went under. Six years later we are still paying for that crucial mistake."

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